# Before the

# FEDERAL COMMUNICATIONS COMMISSION

Washington, D.C. 20554

In the Matter of	)	
	)	
Connect America Fund	) WC D	ocket No. 10-90
	)	

# COMMENTS OF SOUTH SLOPE COOPERATIVE TELEPHONE COMPANY

South Slope Cooperative Telephone Company ("South Slope") respectfully submits the following comments to the Federal Communications Commission ("FCC") in response to the Wireline Competition Bureau's (Bureau) publication of the list of all census blocks that price cap carriers have requested funding to serve as part of the second round of Connect America Phase I ("Public Notice").<sup>1</sup>

The census blocks listed within Appendix A attached hereto, which appear on the Bureau's list of all census blocks that price cap carriers have requested funding to serve as part of the second round of Connect America Phase I<sup>2</sup> ("List"), are inaccurately reported on the List as underserved for the reasons South Slope provides herein. The blocks listed on Appendix A are served by South Slope through their overbuild of the Oxford, Iowa Exchange. South Slope hereby requests that these census blocks be removed from the Bureau's unserved and underserved List, as South Slope has Fiber To The Loop ("FTTL") and DSL service to these

<sup>&</sup>lt;sup>1</sup> Wireline Competition Bureau Publishes Census Blocks, And Commences Challenge Process, For Second Round Of Connect America Phase I, WC Docket No. 10-90, Public Notice, DA 13-1832 (rel. August 28, 2013).

<sup>&</sup>lt;sup>2</sup> http://hraunfoss.fcc.gov/edocs\_public/attachmatch/DOC-323008A1.xlsx (rel. August 28, 2013).

areas and currently serves these areas with speeds that meet or exceed 4 Mbps downstream and 1 Mbps upstream.

South Slope has been providing voice and data services to the entire Oxford, Iowa Exchange, which includes these census blocks, since 1999. Windstream, the ILEC provider in the census blocks listed within Appendix A, has not made any improvements to their Internet service to these census blocks in over ten years. Thus, South Slope overbuilt the Oxford Exchange with RUS loan financing and currently provides high speed broadband services within all areas of the Oxford Exchange. Therefore, the attached Appendix A provides the most current broadband service data regarding the blocks on Appendix A. Also included with this filing as documented evidence for South Slope's service in the respective census blocks, is an Affidavit from Justyn Miller, Chief Executive Officer of South Slope, as well as a screen print from South Slope's website outlining the available speeds, attached hereto as Appendix B. Also attached as Appendix C are redacted customer bills showing South Slope is capable of providing broadband services that meet or exceed 4 Mbps downstream and 1 Mbps to addresses within the census blocks in question.

South Slope's FTTL broadband platform within the Oxford, Iowa Exchange is capable of delivering bandwidth that meets or exceeds 4 Mbps downstream and 1 Mbps upstream, to each anchor institution, business and residential location constructed within the census blocks listed on Appendix A.

South Slope appreciates the opportunity to file these comments relating to areas shown as eligible census blocks that price cap carriers have requested funding to serve as part of the second round of Connect America Phase I. In conclusion, South Slope requests the census

blocks listed on Appendix A all within the Oxford, Iowa Exchange be deemed as served for the reasons stated herein and be removed from the list of areas eligible for Phase I support going forward.

Respectfully submitted,

By: /s/ Justyn Miller

Justyn Miller

Chief Executive Officer

South Slope Cooperative Telephone Company

980 North Front St

PO Box 19

North Liberty, IA 52317

(319) 626-2211 (phone)

(319) 665-7000 (fax)

September 25, 2013

cc: Ryan Yates at <a href="mailto:Ryan.Yates@fcc.gov">Ryan Yates@fcc.gov</a>

Charles Tyler at <a href="mailto:Charles.Tyler@fcc.gov">Charles Tyler@fcc.gov</a>

# **APPENDIX A**

List of Blocks that Do Not Belong on the Bureau's List of census blocks that price cap carriers have requested funding to serve as part of the second round of Connect America Phase I

Iowa County, Iowa:
190959601003075
190959601003081
190959601003097
190959601003200
Johnson County, Iowa:
191030103011024
191030103011025

# **AFFIDAVIT**

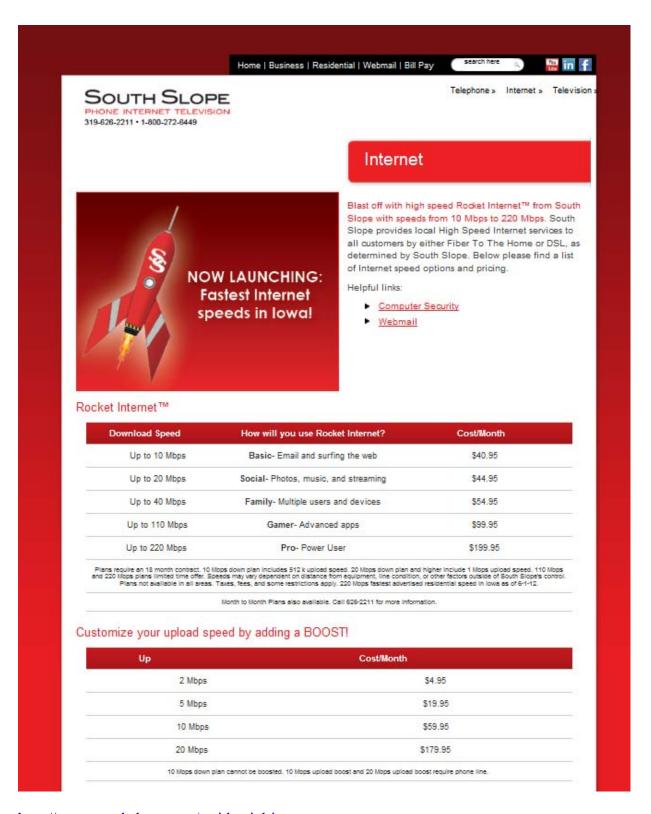
- I, Justyn Miller, as Chief Executive Officer of and on behalf of South Slope Cooperative Telephone Company, have personal knowledge of the following:
  - (i) South Slope Cooperative Telephone Company overbuilt the Oxford, Iowa Exchange with RUS loan financing and currently provides FTTL and DSL services within all areas of the Oxford Exchange; and
  - (ii) South Slope Cooperative Telephone Company's FTTL broadband platform within the Oxford, Iowa Exchange is capable of delivering bandwidth that meets or exceeds 4 Mbps downstream and 1 Mbps upstream within the above listed blocks.

I verify under penalty of perjury that the foregoing is true and correct. Executed on September 25, 2013.

# /s/ Justyn Miller

Justyn Miller, Chief Executive Officer, South Slope Cooperative Telephone Company

# APPENDIX B



http://www.southslope.com/residential-internet

# **APPENDIX C**

Customer bills from addresses within the census blocks in question. The attached customer bills have been redacted to protect customer privacy.

Iowa County, Iowa:

**190959601003075** – 3385 180<sup>th</sup> St, Homestead, IA

**190959601003081** - There are only two homes within South Slope's service area. One does not have Internet service and the other did have South Slope's Internet and phone but discontinued their service in 2005. South Slope is able to provide high speed broadband service that meets or exceeds 4 Mbps downstream and 1 Mbps upstream upon request.

**190959601003097** - There are no homes within South Slope's service area. South Slope is able to provide high speed broadband service that meets or exceeds 4 Mbps downstream and 1 Mbps upon request.

**190959601003200** – 1880 Y Ave, Homestead, IA

3349 190<sup>th</sup> St, Homestead, IA

1874 Y Ave, Homestead, IA

Johnson County, Iowa:

191030103011024 - 2798 Rhine Creek Way NW, Oxford, IA

2556 Johnson Iowa Road, Homestead, IA

191030103011025 - 2677 Rhine Creek Way NW, Oxford, IA

000000398190

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | www.southslope.com

# Bill At A Glance 09/01/2013 PRESTON OR KIM

THANKS FOR YOUR PAYMENT Previous Balance Due

08-13

SUMMARY BY SERVICE TYPE

TV SERVICE INTERNET SERVICES CHOICE PROTECTION PLAN

**CURRENT BILLING AMOUNT** 



HIGH SPEED INET: ACCOUNT NO: Previous Bill Payments/Adj **Current Billing Total Due** 

# MESSAGE CENTER

Payments received after 08-27 are not reflected on this statement.

2013 for Labor Day.

New TV channel updates: South Slope added Golf HD (channel 446), NBC Sports Network HD (channel 449), and MSNBC HD (channel 507) to Superior, Supreme, Superior Business, and for WIA customers with HD basic. Additionally, Superior, Supreme, and WIA customers with HD basic will now receive E! HD (channel 493), Oxygen HD (channel 582), and Esquire HD (G4) (channel 593). ---Fox Soccer Channel will become FXX, channel 44 on Superior and

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190959601003200 - Census Block

Please return lower portion with your payment...retain upper portion for your records.

09/01/2013

# PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | www.southslope.com

13787 1 AT 0.384

HOMESTEAD IA

52236-8503

ունիերիկիկերի ինկիկիկիկիկիկիկիկիկի

ACCOUNT NO: HIGH SPEED INET EFT on 10th

Payment Due

09/20/2013

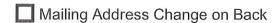
Total Due

Enter Amount Paid

SOUTH SLOPE COOPERATIVE TELE 980 N FRONT ST **PO BOX 19** NORTH LIBERTY IA 52317-0019 լելըրեալիկարվիկվիրդիրը կանակրենիլի ինկին և









HIGH SPEED BILL DATE: 09/01/2013

PRESTON OR KIM

# MONTHLY USAGE FOR HIGH SPEED INET:

מוסמיוובי ספקסרי סוגיווסוי סי בבס וועביי		
Description	Date	Amount
Previous Balance Due		.00

INTERNET SERVICES
RESIDENTIAL INTERNET PLAN UP TO 10M/512K FREE EXTRA E-MAIL
FREE EXTRA E-MAIL
BROADBAND USF - INTERNET - CLEC PROMO MODEM

08/27

**1** (2)

INTERNET SERVICES SUBTOTAL

CURRENT BILLING AMOUNT

SUB-TOTAL

Pay By Bank on 10th - Do Not Pay

CHOSUS Tract BLOCK Preston

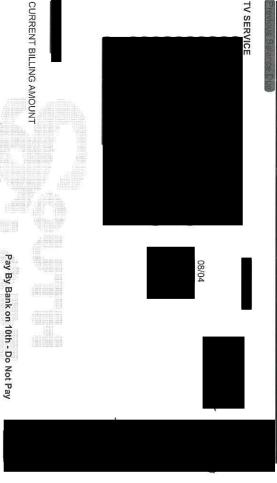
190959601003200



PHONE INTERNET TELEVISION
980 N FRONTST. PO19 | NORTH LIBERTY, IA 52317
319 626 2211 | WWW.SOUTHSLOPE.COM









PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM

# Bill At A Glance 09/01/2013

No Payments Received Previous Balance Due

SUMMARY BY SERVICE TYPE

INTERNET SERVICES

**CURRENT BILLING AMOUNT** 

Credit Card on 10th - Do Not Pay



Previous Bill	Payments/Adj	Current Billing	Total Due

# MESSAGE CENTER

Payments received after 08-27 are not reflected on this statement.

The South Slope business office will be closed on September 2, 2013 for Labor Day.

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190959601003075 - Census Block

Please return lower portion with your payment...retain upper portion for your records.

09/01/2013

ROBERT

# SOUTH SLOPE

PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM



13768 1 AT 0.384 ROBERT PAULA 3385 180TH ST

4 13768 C-61 P-61

HOMESTEAD IA 52236-8540

դոլիայանոլիարդիրդիկոլիիանիկորդիկորի

HIGH SPEED INET:

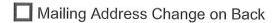
Payment Due

09/20/2013

**Total Due** 









ROBERT
ACCOUNT NO:
HIGH SPEED INET:
BILL DATE: 09/01/2013
Page: 3 of 3

# MONTHLY USAGE FOR HIGH SPEED INET:

Description	Date	Quantity
Previous Balance Due		
INTERNET SERVICES	09/01-09/30	
RESIDENTIAL INTERNET PLAN UP TO 10M/512K		9
RESIDENTIALINT	07/16-08/31	
HIGH SPEED INTERNET ACTIVATION FEE	07/16	
BROADBAND USF-INT-CL	08/27-08/27	
BROADBAND USF - INTERNET - CLEC	08/27	
lowa State Sales Tax		
lowa Cty Local Opt Tax		

INTERNET SERVICES SUBTOTAL

SUB-TOTAL

CURRENT BILLING AMOUNT

OUNT

Credit Card on 10th - Do Not Pay

Lensus Tract Block Robert



000000492333

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM

# Bill At A Glance 09/01/2013 ROBERT E OR SUSAN

BALANCE FROM LAST BILLING THANKS FOR YOUR PAYMENT **Previous Balance Due** 

08-19



SUMMARY BY SERVICE TYPE

TELEPHONE SERVICES INTERNET SERVICES

**CURRENT BILLING AMOUNT** 

**Total Due: Please Pay This Amount** 



TELEPHONE:

ACCOUNT NO:

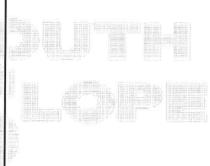
Previous Bill Payments/Adj **Current Billing Total Due** 

# MESSAGE CENTER

Payments received after 08-27 are not reflected on this statement.

The South Slope business office will be closed on September 2, 2013 for Labor Day.

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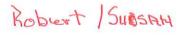


190959601003200 - Census Block

Please return lower portion with your payment...retain upper portion for your records.

# PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | www.southslope.com



4 13722 C-61 P-61

3349 190TH ST

HOMESTEAD IA 52236-8541

հրարդիցիայինիկութիկան Առալինիցիկիկիկիլի

Mailing Address Change on Back

09/01/2013

ROBERT E OR SUSAN I

Payment Due 09/20/2013

**Total Due** 

ACCOUNT NO: TELEPHONE:

Enter Amount Paid

SOUTH SLOPE COOPERATIVE TELE 980 N FRONT ST NORTH LIBERTY IA 52317-0019 լեգլլենուլիիորվերիկին կլանակլիոնվ լինվական լ

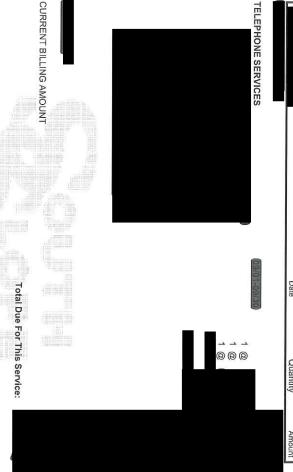




PHONE INTERNET TELEVISION
980 N FRONT ST. PO19 | NORTH LIBERTY, IA 52317
319 626 2211 | WWW.SOUTHSLOPE.COM

ROBERT E OR SUSAN K Page: 3 of 4 BILL DATE: 09/01/2013 TELEPHONE: ACCOUNT NO:

MONTHLY USAGE FOR TELEPHONE:



CURRENT BILLING AMOUNT

SUB-TOTAL

Robert / SUSAN 190959601003200

The carrier you have chosen for your long distance (IntraLATA) calls is South Slope LD. The carrier you have chosen for your long distance (InterLATA) calls is South Slope LD.



PHONE INTERNET TELEVISION
980 N FRONTST. PO19 | NORTH LIBERTY, IA 52317
319 626 2211 | WWW.SOUTHSLOPE.COM

BILL DATE: 09/01/2013 ACCOUNT NO: TELEPHONE:

MONTHLY USAGE FOR HIGH SPEED INET: Page: 4 of 4

	21903/2002	· Commence	
Previous Balance Due			
INTERNET SERVICES	09/01-09/30		

BROADBAND USF - INTERNET - CLEC INTERNET SERVICES SUBTOTAL PROMO MODEM RESIDENTIAL INTERNET PLAN UP TO 10M/512K 08/27

Total Due For This Service:



980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | www.southslope.com

# Bill At A Glance 08/01/2013

JUSTIN OR ERICA

BALANCE FROM LAST BILLING THANK YOU FOR YOUR PAYMENT(S)! Previous Balance Due

07-23

.00

SUMMARY BY SERVICE TYPE

INTERNET SERVICES

**CURRENT BILLING AMOUNT** 

**Total Due: Please Pay This Amount** 



HIGH SPEED INET:

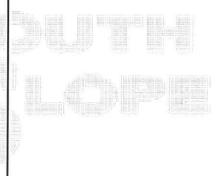
Previous Bill Payments/Adj **Current Billing Total Due** 

# **MESSAGE CENTER**

If you have any questions on your new bill format, please call our office at 319-626-2211 and a member of our team would be happy to assist you!

Payments received after 07-25 are not reflected on this statement.

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190959601003200 - Census Block

Please return lower portion with your payment...retain upper portion for your records.

# PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | www.southslope.com

Justin

13583 1 AT 0.384 JUSTIN OR ERICA 1874 Y AVE HOMESTEAD IA 52236-8503

4 13583 C-61 P-61

Payment Due **Total Due** 08/01/2013 JUSTIN OR FRICA ACCOUNT NO: HIGH SPEED INET:

> SOUTH SLOPE COOPERATIVE TELE PO BOX 19 980 N FRONT STREET NORTH LIBERTY IA 52317-9005 [dd:daaldadlaaa][laadlaldadlaadlaaa[daadlaadlaad







JUSTIN OR ERICA ACCOUNT NO: HIGH SPEED INET: BILL DATE: 08/01/2013 Page: 3 of 3

# MONTHLY USAGE FOR HIGH SPEED INET

Description	Date	Quantity	Amount
Previous Balance Due			
INTERNET SERVICES RESIDENTIAL INTERNET PLAN UP TO 10M/512K	08/01-08/31	 (0)	
PROMO MODEM BROADBAND USF - INTERNET - CLEC	07/25		
INTERNET SERVICES SUBTOTAL			
SUB-TOTAL			
CURRENT BILLING AMOUNT			
	Total Due	Total Due For This Service:	

Ceasus Pract Block 190959601003200



980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM

# Bill At A Glance 09/01/2013

BALANCE FROM LAST BILLING THANKS FOR YOUR PAYMENT **Previous Balance Due** 

08-12

## SUMMARY BY SERVICE TYPE

TELEPHONE SERVICES
TV SERVICE
INTERNET SERVICES
CHOICE PROTECTION PLAN

## **CURRENT BILLING AMOUNT**

Credit Card on 10th - Do Not Pay



1901030103011025 - Census Block

Previous Bill Payments/Adj Current Billing Total Due

# **MESSAGE CENTER**

Payments received after 08-27 are not reflected on this statement.

The South Slope business office will be closed on September 2, 2013 for Labor Day.

New TV channel updates: South Slope added Golf HD (channel 446), NBC Sports Network HD (channel 449), and MSNBC HD (channel 507) to Superior, Supreme, Superior Business, and for WIA customers with HD basic. Additionally, Superior, Supreme, and WIA customers with HD basic will now receive E! HD (channel 493), Oxygen HD (channel 582), and Esquire HD (G4) (channel 593). --- Fox Soccer Channel will become FXX, channel 44 on Superior and Supreme packages, beginning September 2nd.

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Please return lower portion with your payment...retain upper portion for your records.

# SOUTH SLOPE

PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM



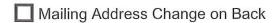
5851 1 AV 0.360 DONALD( 2677 RHINE CREEK WAY NW OXFORD IA 52322-9188 4 5851 C-25 P-25

վկերիվոկներիկանկիկիկումունընդուկներ

DONALD Enter Amount Paid
ACCOUNT NO: 1
TELEPHONE:







PHONE INTERNET TELEVISION
980 N FRONT ST. PO19 | NORTH LIBERTY, IA 52317
319 626 2211 | WWW.SOUTHSLOPE.COM

BILL DATE: 09/01/2013 Page: 5 of 8 TELEPHONE: ACCOUNT NO: DONALD

MONTHLY USAGE FOR TELEPHONE:

SUB-TOTAL CURRENT BILLING AMOUNT TELEPHONE SERVICES Previous Balance Due TELEPHONE SERVICES SUBTOTAL Credit Card on 10th - Do Not Pay 09/01-09/30 \_ \_ \_ \_ 0000

SUB-TOTAL

The carrier you have chosen for your long distance (IntraLATA) calls is South Slope LD. The carrier you have chosen for your long distance (InterLATA) calls is South Slope LD.

Cource

CENSUS TRACT BLOCK 191030103011025



PHONE INTERNET TELEVISION
980 N FRONTST. PO19 | NORTH LIBERTY, IA 52317
319 626 2211 | WWW.SOUTHSLOPE.COM

TELEPHONE: Page: 6 of 8 BILL DATE: 09/01/2013 ACCOUNT NO: DONALD

# MONTHLY USAGE FOR HIGH SPEED INET:

חולים היו	INTERNET SERVICES	Previous Ralance Due
DISTRICT SHIPTING DISTRICT TO ASSESSED TO	09/01-09/30	
		100000

Quantity

Amount





000000308023

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | www.southslope.com

# Bill At A Glance 09/01/2013

BALANCE FROM LAST BILLING THANKS FOR YOUR PAYMENT **Previous Balance Due** 

08-07

## SUMMARY BY SERVICE TYPE

TELEPHONE SERVICES South Slope Long Distance INTERNET SERVICES

## CURRENT BILLING AMOUNT

**Total Due: Please Pay This Amount** 



TELEPHONE:

ACCOUNT NO:

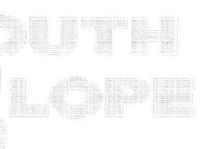
Previous Bill	Payments/Adj	Current Billing	Total Due

# MESSAGE CENTER

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1901030103011024 - Census Block

Please return lower portion with your payment...retain upper portion for your records.

# PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM



2798 RHINE CREEK WAY NW OXFORD IA 52322-9187

4 5318 C-23 P-23

դիլիոս||ՄՄՄՈլլլ||ՄՄդիդիդոդիսիգՄլիհիլ||իմլ

TOM ACCOUNT NO: TELEPHONE:

09/01/2013

Payment Due **Total Due** 09/20/2013 **Enter Amount Paid** 

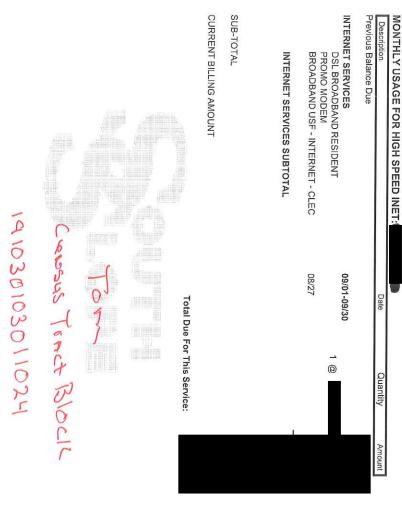
SOUTH SLOPE COOPERATIVE TELE 980 N FRONT ST PO BOX 19 NORTH LIBERTY IA 52317-0019 լեգրբեագիվութ[ինիկինգ]յյթներերի այլ ինկին || Միլիկին |







TOM ACCOUNT NO:
TELEPHONE:
BILL DATE: 09/01/2013
Page: 5 of 5



## PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM

# Bill At A Glance 09/01/2013

GEORGE OR PAM

BALANCE FROM LAST BILLING THANKS FOR YOUR PAYMENT Previous Balance Due

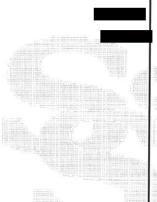
08-07

SUMMARY BY SERVICE TYPE

TELEPHONE SERVICES INTERNET SERVICES

CURRENT BILLING AMOUNT

Credit Balance -- Do Not Pay



TELEPHONE:

ACCOUNT NO:

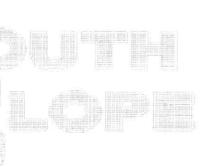
Previous Bill Payments/Adj Current Billing Total Due

# MESSAGE CENTER

Payments received after 08-27 are not reflected on this statement.

The South Slope business office will be closed on September 2, 2013 for Labor Day.

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1901030103011024 - Census Block

Please return lower portion with your payment...retain upper portion for your records.

09/01/2013

7634-

GEORGE OR PAM

ACCOUNT NO: TELEPHONE:

# SOUTH SLOPE

# PHONE INTERNET TELEVISION

980 N FRONT ST. PO 19 | NORTH LIBERTY, IA 52317 319-626-2211 | WWW.SOUTHSLOPE.COM

Georgie

13750 1 AT 0.384 GEORGE OR PAM 2556 JOHNSON IOWA RD HOMESTEAD IA 52236-9000 4 13750 C-61 P-61

վրուդիլլուրակինըլուգիուդիութիլիկդայիկ

SOUTH SLOPE COOPERATIVE TELE 980 N FRONT ST PO BOX 19 NORTH LIBERTY IA 52317-0019



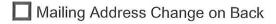
լեգրբեոգի իորվիել կեզիյը հեռեւյլ եռ կիլի կինիլ և Ա

Payment Due

09/20/2013

**Total Due** 

**Enter Amount Paid** 

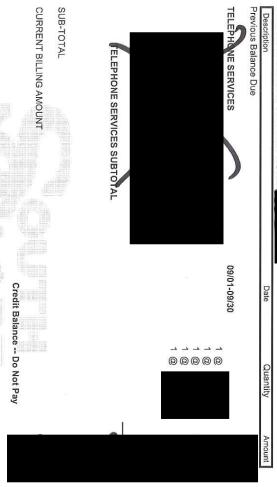






BILL DATE: 09/01/2013 Page: 3 of 4 ACCOUNT NO: TELEPHONE:

# MONTHLY USAGE FOR TELEPHONE:



The carrier you have chosen for your long distance (IntraLATA) calls is South Slope LD. The carrier you have chosen for your long distance (InterLATA) calls is South Slope LD.

Crewsons Tract Block 191030103011024 25000C



PHONE INTERNET TELEVISION
980 N FRONT ST. PO19 | NORTH UBERTY, IA 52317
319 626 2211 | WWW.SOUTHSLOPE.COM SOUTH SLOPE

> TELEPHONE: ACCOUNT NO: GEORGE OR PAM

Page: 4 of 4 BILL DATE: 09/01/2013

Amount

MONTHLY USAGE FOR HIGH SPEED INET:

CURRENT BILLING AMOUNT SUB-TOTAL INTERNET SERVICES Previous Balance Due INTERNET SERVICES SUBTOTAL BROADBAND USF - INTERNET - CLEC FREE EXTRA E-MAIL FREE EXTRA E-MAIL PROMO MODEM DSL BROADBAND RESIDENT 08/27 09/01-09/30 Total Due For This Service: (9)

